

Exhibit E

JONES DAY

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May 30, 2019

VIA ELECTRONIC MAIL

Jason Ibey, Esq.
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Costa Mesa, California 92626
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Dear Jason,

This letter serves as LMB Mortgage Services, Inc.'s further response to your client's subpoena.

LMB conducted a search for documents related to Gayle Hyde and the telephone number (612) 836-8955. (Request Nos. 1 and 2.) LMB does not have any records pertaining either to Ms. Hyde or that telephone number to produce in response to your client's subpoena.

With regard to Amanda Hill and the telephone number (951) 813-9785 (Request Nos. 3 and 4), LMB already has produced the documents related to Ms. Hill and that phone number. *See* Dkt. Nos. 29-5 and 44-2 (download of data into excel spreadsheet).

In your letter of May 23, 2019, you state that "LMB should also produce any documents and ESI reflecting any evidence that Plaintiff Gayle Hill or Plaintiff Amanda Hill 'clicked on the button manifesting assent to the Terms of Use and Privacy Policy[.]'" As noted, LMB could not locate any documents regarding Gayle Hyde or her phone number. With regard to Amanda Hill, those documents have been produced. LMB only captures and retains information, and creates a lead, *after* a consumer "click[s] on the button manifesting assent to the Terms of Use and Privacy Policy[.]" Because there is information in LMB's database regarding Ms. Hill and her telephone number, that means, necessarily, that she "clicked on the button manifesting assent to the Terms of Use and Privacy Policy[.]" There is no other way that LMB would have such information in its records. My client already has submitted a declaration, under penalty of perjury, attesting to that fact. LMB has thus fully complied with its subpoena obligations.

Very truly yours,

/s/ *John A. Vogt*
John A. Vogt